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11 IN THE UNITED STATES DISTRICT COURT  
12  
13 FOR THE EASTERN DISTRICT OF CALIFORNIA

14  
15 UNITED STATES OF AMERICA, ) CR. NO. S-04-442 WBS  
16 )  
17 Plaintiff, ) STIPULATION AND [PROPOSED] ORDER  
18 ) CONTINUING STATUS CONFERENCE AND  
19 v. ) EXCLUDING TIME  
20 )  
21 AMIR NOSHIN, ) Date: August 3, 2005  
22 ) Time: 9:00 a.m.  
23 Defendant. ) Crtrm: Hon. William B. Shubb  
24 )  
25

26 Plaintiff, United States of America, by and through Assistant  
27 U.S. Attorney Robin R. Taylor, and defendant Amir Noshin, by and  
28 through counsel, Johnny L. Griffin, III, Esq., hereby STIPULATE AND  
1 AGREE to continue the status conference set for June 29, 2005, to  
2 August 3, 2005.

3 The parties have further AGREED AND STIPULATED that time should  
4 be excluded from June 29, 2005, through and including August 3,  
5 2005, to provide defense counsel reasonable time to prepare pursuant  
6 to the Speedy Trial Act, 18 U.S.C. § 3161(h)(8)(B)(iv) [Local Code  
7 T4]. The defense has requested a continuance, and it is justified,  
8 because the case (1) involves a complex access device fraud scheme;  
9 (2) defense counsel, who was just recently substituted into the

1 case, needs additional time to evaluate the case and review  
2 discovery; (3) the defense needs additional time to evaluate  
3 information recently obtained by the parties; and (4) the parties  
4 need additional time to discuss case resolution. The defendant is  
5 in custody.

6 DATED: June 30, 2005

McGREGOR W. SCOTT  
United States Attorney

8 By: /S/ Robin Taylor  
9 ROBIN R. TAYLOR  
Assistant U.S. Attorney

11 DATED: June 30, 2005

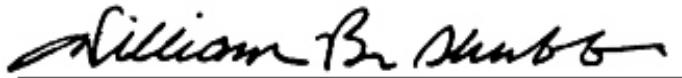
12 By: /S/ Johnny L. Griffin, III  
13 JOHNNY L. GRIFFIN, III, ESQ.  
Attorney for Amir Noshin

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14 ORDER

15 **IT IS SO ORDERED.**

16 DATED: June 30, 2005

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18 WILLIAM B. SHUBB  
19 UNITED STATES DISTRICT JUDGE